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8

9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

Case No. 2:20-mj-00980-VCF

11 v.
12 Plaintiff,

Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report

13 JOSEFINA GONZALEZ-PEREZ,
aka "Magdalena Gonzalez-Valenzuela,"
aka "Elizabeth Bejarano-Maria,"

14 Defendant.

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
18 Attorney, counsel for the United States of America, and Lauren B. Torre, Assistant Federal
19 Public Defender, counsel for Defendant JOSEFINA GONZALEZ-PEREZ, that the Court
20 direct the U.S. Probation Office to prepare a report detailing the defendant's criminal
21 history.

22 This stipulation is entered into for the following reasons:

23 1. The United States Attorney's Office has developed an early disposition
24 program for immigration cases, authorized by the Attorney General pursuant to the

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 13th day of November, 2020.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Lauren B. Torre
Lauren B. Torre
Assistant Federal Public Defender
Counsel for Defendant JOSEFINA
GONZALEZ-PEREZ

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:20-mj-00980-VCF

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report

V.

JOSEFINA GONZALEZ-PEREZ,
aka "Magdalena Gonzalez-Valenzuela,"
aka "Elizabeth Bejarano-Maria,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 16th day of November, 2020.

Carl Gaddis

**HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE**